

Founded 1939

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May 1, 2008

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EPA Region 10
Deemed Releasable

Cara Steiner-Riley
Environmental Protection Agency
Office of Regional Counsel
1200 Sixth Avenue, ORC-158
Seattle, WA 98101

**RE: Request for Information to J.H. Baxter & Co. – Scope and Timing of
Required Response**

Dear Ms. Steiner-Riley:



This letter is our joinder with the earlier letter presented by Altino Properties, Inc., our joint venture partner in Quendall Terminals. We join with and confirm that we have the same understandings expressed by Ms. Manolopoulos on behalf of her client, Altino Properties.

In addition, J.H. Baxter has noted that the 104(e) scope also includes documents related to the operations of the J.H. Baxter facility at Renton, Washington, immediately adjacent to the Quendall Terminals site. As we discussed, J.H. Baxter will retain and maintain all existing documents wherever located, intending to produce those whenever specifically directed to do so.

As we discussed, the current owner has completed a remediation of the property under the supervision of the Department of Ecology, State of Washington. Our discussions would lead us to believe that you will address the information contained within the Department of Ecology's files regarding the final reports and studies that have identified the nature and extent of groundwater contamination from the operations at the J.H. Baxter plant and the remediation plan to deal with those concerns.

If you are in need of information additional to that, please advise and we will try to locate within our files the technical reports to the extent that they were completed at the time of the sale.

We also confirm the points raised by Ms. Manolopoulos in her letter to you regarding the document production as avoidance of the purchase documents, technical documents, electronic documents and duplicate copies. Of course, in respect to J.H. Baxter, the avoidance of

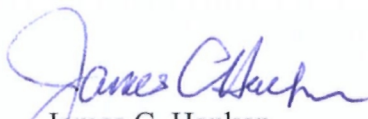
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duplication will be reflected by what Altino produces and/or what consultants have already produced to date for and to the EPA.

If this letter does not confirm the agreement reached during our meeting last week, please contact me immediately. Otherwise we will agree to produce additional information to the EPA and will provide you with periodic updates on our progress. We appreciate EPA's cooperation as J.H. Baxter undertakes this significant and costly effort.

Very truly yours,



James C. Hanken
Wolfstone, Panchot & Bloch, P.S., Inc.

JCH/kf

cc: Georgia Baxter
Rue Ann Thomas
Lynn T. Manolopoulos